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Attorneys for Plaintiff

5 IN THE UNITED STATES DISTRICT COURT  
6 DISTRICT OF NEVADA

7 CLAUDIA JONES,

8 Plaintiff,  
9 vs.

CASE NO: 2:20-cv-01452-VCF

10 ANDREW M. SAUL,  
Commissioner of Social Security,

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

11 Defendant.  
12 \_\_\_\_\_/

13 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Plaintiff,  
14 CLAUDIA JONES, and Defendant, ANDREW M. SAUL, by and through their respective counsel,  
15 respectfully request to extend the deadline for Plaintiff to file her Motion for Remand and/or  
16 Reversal, up to and including **Friday, June 25, 2021**, regarding the above-mentioned case. For the  
17 reasons set forth below, good cause exists to extend the deadline, as requested.

18 The current deadline for Plaintiff to file her Motion for Remand is **April 8, 2021**. Plaintiff's  
19 counsel is currently preparing for a 10-day trial scheduled to commence on June 7, 2021, in  
20 Pahrump, Nevada. At the present time, the discovery phase of that case is intense, and numerous  
21 depositions are scheduled of treating physicians, expert witnesses and fact witnesses. There are also  
22 several motions pending in that case, and an in-person appearance is required to conduct oral  
23 arguments on those motions, which involves days out of the office for Plaintiff's counsel to travel  
24 to Pahrump, Nevada. Additionally, Plaintiff's counsel has numerous depositions and mediations  
25 scheduled in other cases, and does not have sufficient time to devote to this case.

26 For the reasons mentioned above, the parties respectfully request that the Court grant the  
27 Stipulation extending the deadline for Plaintiff to file her Motion for Remand and/or Reversal in this  
28 case. *See* Fed. R. Civ. P. 6(b)(1)(A), ("When an act may or must be done within a specified time,

1 the court may, *for good cause*, extend the time ... with or without motion or notice if the court  
2 acts, or if a request is made, before the original time or its extension expires[.]” (emphasis added).

3 This is the first request for an extension of time in this case. This stipulated request is filed  
4 in good faith and not for the purpose of undue delay.

5 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of March, 2021.

6 **ERICKSON, THORPE &  
7 SWAINSTON, LTD.**

**NICHOLAS A. TRUTANICH**  
**United States Attorney**

8 /s/ JOHN C. BOYDEN  
9 JOHN C. BOYDEN, ESQ.  
*Counsel for Plaintiff*

/s/ ALLISON J. CHEUNG  
ALLISON J. CHEUNG, ESQ.  
Assistant United States Attorney  
*Counsel for Defendant*

12 **IT IS SO ORDERED.**

13 **DATED: March <sup>11</sup> 2021.**

14   
15 **U.S. MAGISTRATE JUDGE**